

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE TRANSPARENCY PROJECT,	§	
	§	
Plaintiff,	§	CIVIL ACTION No. 4:20CV467
	§	
v.	§	
	§	
U.S. DEPARTMENT OF JUSTICE, et al.,	§	JUDGE SEAN D. JORDAN
	§	
Defendants.	§	

JOINT PRODUCTION SCHEDULE FOR FBI REQUESTS

In compliance with the Court's request at the telephonic status conference held on January 18, 2022, the parties jointly submit the following agreed production schedule regarding the FBI requests:

Butowsky/Couch Request

The June 18, 2020 (1469375-000) request regarding records pertaining to surveillance of Edward Butowsky and Matt Couch has been fully processed, and a final release was issued to Plaintiff.

Imran Awan Requests

The June 26, 2018 (1421854-000) and June 11, 2020 (1468312-000) requests seek the same information regarding records referencing Imran Awan, et al. The FBI's processing of these requests is ongoing at a rate of approximately 500 pages per month. The FBI is making preprocessed releases on or about the 27th of each month. When production is complete, the parties will submit a proposed briefing schedule, as necessary.

DNC Hack Request

The June 15, 2020 (1469813-000) request for records related to the alleged hacking of Democratic National Committee (“DNC”) emails is ongoing. To date, FBI has identified 495,862 pages of potentially responsive main file documents and has produced to Plaintiff 932 pages of serials indexing the main file documents. The FBI has also identified approximately 22,000 pages of sealed records contained within the main file documents. The FBI provided a list of the criminal case cites of the sealed records, and Plaintiff agrees that he is not entitled to the sealed records and that those do not need to be processed.

The FBI is also in the process of converting subfile documents into readable format. To date, FBI has identified approximately 1.5 million pages of converted subfile documents and has approximately 5 GB of subfiles left to convert. The FBI is unable to identify a page count of the 5 GB of unconverted subfiles until the conversion process is complete.

Due to the extensive scope of the current request and the millions of potentially responsive documents at issue in this case, Plaintiff has agreed to submit a narrowed request to the FBI in an effort to create a manageable universe of documents to process. Plaintiff will submit his narrowed request to the FBI within thirty days, on or before February 21, 2022.

The FBI will start production at a rate of 500 ppm after the parties agree on the narrowed scope of the search. The parties will notify the Court when production begins so that the Court can schedule a status conference 90 days thereafter.

Respectfully submitted,

BRIT FEATHERSTON
UNITED STATES ATTORNEY
/s/ *Andrea L. Parker*

ANDREA L. PARKER
Assistant United States Attorney
Texas Bar No. 00790851
550 Fannin St. Suite 1250
Beaumont, Texas 77701-2237
Tel: (409) 839-2538
Fax: (409) 839-2550
Email: andrea.parker@usdoj.gov

/s/ *Ty Odell Clevenger (with permission)*

TY ODELL CLEVINGER
Attorney at Law
P.O. Box 20753
Brooklyn, NY 11202-0753
Tel: (979) 985-5289
Fax: (979) 530-9523
Email: tyclevenger@yahoo.com